Case 1:04-cv-00341-SJM Document 23-3 Filed 04/03/2006 Page 2 of 19

3. TRAINING		Dates attended		No. of credits completed			Did you	Туре	Major course
	Name and Address	From	То	Semester hrs.	Clock hrs.	Other (specify)	graduate?	Degree Recd.	of study
igh School	LEBANON HIGH SCHOOL LEBANON, PA	9/60	6/				y		ACADEMIC
echnical, usiness or ther Schools									
ollege, niversity or rofessional School	PENN STATE of UNIVERSITY PARKET	9/69	971	1604			Y	BA	CHEM KAW ENF
	GONNESTOUN STATE, YOUNGSTOWN, OH		5/18	45			y	MS	CRIM JUSTKE
redits obtained sewhere such s CLEP	EDWSORD UDFPA, EDIN BORD PA	9/79	5/81	18					ACCT
	Educational credits may be verified if offer			Transcri	A.			· : '	

1	ËΧ	PFR	IFΝ	CF

List your experience record. Include paid employment, volunteer or unpaid work, and military service which in your opinion helps to qualify you for the job you want. If your title and duties changed

in the course of your work with one employer, describe the changed duties in a new block. <u>Attach additional sheets</u>, if needed. List the question number and your social security number on each attached sheet.

	<u> (1. 1. 2. 2. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.</u>
IA. Present or most recent From: Mo. / Yr. 2002	Name of Employer FAMLY SERVICES OF NW PA PINE ST., MEADVILESH Evaluation Verification
TO: MO. Yr.	Type of Business Your Title Name and Title of your Supervisor SCIALSER VICES THERAPOLITIC SUPPORT STAFF GLOVIA KNIGHT, LSW
tal time spent s. Mos. Co tal hrs. worked onthly Weekly 35 sarty Salary arting esent (3.00/HR	DUTIES: Supply all details that you feel are needed to correctly describe your work. State size and kind of work force, if any, supervised by you and extent of such supervision. Add extra sheets, if needed. TAN A SOCIAL WONKER WHO WONKS ON A ONE-W-ONE DASIS WITH TROUBLED YOUTH AS A TENAPERTICE SUPPORT STAFF PERSON.

B. From: Mo. 3 Yr. 2004	Name of Employer BLAIR CORPORATION SESS 26TH ST. ENTERA	OFFICIAL USE ONLY Evaluation Verilication
TO: MO. Yr.	Type of Business Your Title Name and Title of your Super MAIL ONDER CUSTOMER SERVICE OPERATOR SRENDA ON	
tal time spent s. / Mos. 4/ tal hrs. worked onthly Weekly 8/ arty Salary arting 7.35/Hs2. st	DUTIES: Supply all details that you feel are needed to correctly describe your work. State size and kind of work force, if any, supervised by you and extent of such supervision. Add extra sheets, if needed. THE ONDERS AND PROVIDE CUSTOMER SCR. FOR CALLERS WHO ORDER RETAIL FROM BLATCORPORATION	

C. From: Mo.2 Yr. 1972	Name of Employer PA BUR OF NARC TNUES 1957 E 36TH ST. ERIE PA Evaluation 1	
To: Mo. 6 Yr. 2000	Type of Business Your Title Name and Title of your Supervisor Druf LAW ENFORCEMENT NARCOTTO AGENT TOE MARSIC!	
al time spent 2 8 Mos 5 al hrs. worked nthly Weekly 9 0 arly Salary rting 3 61,000/972	DUTIES: Supply all details that you feel are needed to correctly describe your work. State size and kind of work force, if any, supervised by you and extent of such supervision. Add extra sheets, if needed. SUCKN LAW ENFORCE MINT OFFICER DO ING CUERT AND COURT DRUG LAW ENFORCE MENT. I WAS TRAINED TO USE PSYCHOLOGY IN INTERVIEWS AND INTERVIEWS AND INTERVIEWS AND INTERVIEWS AND INTERVIEWS. I PREPARED REPORTS AND EVIDENCE CISCLE IN COURT CASES.	

1	IN THE UNITED STATES DISTR	ICT COURT
2	FOR THE WESTERN DISTRICT OF	PENNSYLVANIA
3	.	
4	DAVID A. DOWS,)
5	Plaintiff,)) Civil Action
6	VS.) No. 2004-3412) ERIE
7 8	KATHERINE E. HOLTZINGER CONNER, ESQ. Chairman PENNSYLVANIA CIVIL SERVICE COMMISSION and JOHN DOE,) RECEIVED) Office of Attorney Canonal
9	Defendant.) MAR 0 8 2006
10		Litigation Section
11	Deposition of CHARLENE	KOLUPSKI
12	Friday, February 24,	2006
13	-	
14	The deposition of CHARLENE KC witness by the plaintiff, pursuant	
15	Federal Rules of Civil Procedure pe taking of depositions, taken before	rtaining to the
16	undersigned, Eugene C. Forcier, Ste Commissioner in and for the Commonw	nographer
17	Pennsylvania, at the offices of the and Youth of the County of Erie, 15	Office of Children
18	Street, Erie, Pennsylvania 16501, o'clock A.m., the day and date abov	commencing at 10:40
19	o crock min, the day and date abov	c sec foren.
20		
21	COMPUTER-AIDED TRANSCRIPT MORSE, GANTVERG & HODGE	
22	ERIE, PENNSYLVANIA 814-833-1799	
23		
24		
25		



- 1 Q And just for the court reporter's sake,
- 2 remember, head shaking --
- 3 A Right.
- 4 Q -- is fine, but it always has to get to a
- 5 yes or no eventually.
- 6 And it turns out there is also an
- 7 additional list, and I am not indicating it is of
- 8 lesser or greater importance, but concurrently there
- 9 is a list of people who have not taken an examination,
- 10 but have filled out a detailed application, that is
- 11 then evaluated, and in those depositions we called it
- 12 various things, but one of them is we began to refer
- 13 to that as the intern list.
- 14 Are you aware the Civil Service Commission
- 15 has a list of interns available for possible hiring by
- 16 the county agencies, like OCY?
- 17 A I am aware that the Civil Service
- 18 Commission was a student intern list.
- 19 It is for hiring as a student intern. That
- 20 list is for hiring as a student intern.
- 21 Q Now, what do you know about how that list
- 22 comes to exist; what -- what happens, so that
- 23 particular -- now, the students to begin with, are
- 24 college students; is that right?
- 25 A Correct.

- 1 then go to the Office of Children and Youth?
- 2 A We request that as a part of the
- 3 information that we want to see from them, yes.
- 4 Q So, would it be correct that for each
- 5 proposed intern who wants to come to OCY Erie, that
- 6 there is a packet of materials that are completed by
- 7 the student, and possibly other people have to do
- 8 components, recommendations and so forth?
- 9 A Correct. Uh-huh. Yes.
- 10 Q And at some point, does all, or part of
- 11 that packet go to the Civil Service Commission?
- 12 A I really am not certain of whether that
- 13 gets to civil service, or if that's maintained in our
- 14 offices, and available to them, if necessary.
- 15 Q Now, in our discussions, the depositions
- 16 with some of the workers at Civil Service Commission,
- 17 it does seem that at some point the Commission
- 18 actually puts together lists of available interns.
- 19 A That's correct.
- 20 Q People who want to be?
- 21 A Uh-huh.
- 22 Q So, does it sound accurate to you, that at
- 23 least some portions of these packets make it to civil
- 24 service, so they can maintain these lists?
- 25 A Yes. They do need to complete a civil

- 1 service application, and specifically, I cannot tell
- 2 you what they are required to attach, but there are
- 3 things that they must attach to the civil service
- 4 application.
- 5 O Now, was I correct earlier, when I
- 6 suggested, in a question, that mainly these are junior
- 7 and senior level college students completing these
- 8 packets?
- 9 A Yes. I believe civil service requires that
- 10 they must minimally be a junior, in their educational
- 11 program.
- 12 Q In your experience, do the majority of the
- 13 students try to time this in their education, so that
- 14 they are performing their internship in their senior
- 15 year?
- 16 A That is the requirement of the school. It
- 17 usually is the final part of their educational
- 18 experience.
- 19 So that that occurs generally at the
- 20 completion of their academic careers.
- 21 Usually, the final semester, or final year.
- 22 Q So, this activity, for the interns,
- 23 generally, not always, but falls in the second
- 24 semester, final semester of their senior year, if
- 25 possible? Is that right?

- 1 A We would then request a civil service list.
- 2 Q What are the reasons that the agency would
- 3 look first to the trainee intern group, and then
- 4 secondarily, to the civil service list group?
- 5 A The civil service student intern
- 6 classification was created by civil service to recruit
- 7 and retain qualified staff in child welfare, and
- 8 mental health service; for our purposes, child
- 9 welfare.
- 10 That is the intent of the classification.
- It gives the agency -- and I believe they
- 12 speak of this in their bulletins, it gives the agency
- 13 the opportunity to see if these individuals are
- 14 capable of doing the work, and it gives the individual
- 15 the opportunity to determine if this is the type of
- 16 work they would like to do.
- So that we have some experience with these
- 18 individuals, some knowledge, and some sense of whether
- 19 or not they can perform the job.
- 20 Additionally, we have had them for
- 21 975 hours, they have knowledge and experience of the
- 22 agency, knowledge and experience of the type of
- 23 services that need to be provided, the client
- 24 population, et cetera.
- 25 And they have actually been in a 975 hour

- 1 training period.
- 2 So that once they would be hired, they
- 3 would be able to assume more responsibilities, more
- 4 quickly, than someone that has not been a part of the
- 5 organization for the last six-month period of time,
- 6 and has not had that education, training, and
- 7 on-the-job experience, and that is the intent of the
- 8 program.
- 9 Q If an individual, in this example, had
- 10 taken the civil service exam, and had the requisite
- 11 prior college training, had been a sociology, or
- 12 social work major, that sort of thing, is there a
- 13 track or option for someone like that to enter into
- 14 the training program?
- 15 A The student intern program?
- 16 O Yes.
- 17 A Not to my knowledge.
- 18 Q So, you haven't encountered an example of
- 19 that happening?
- 20 A Correct.
- 21 Q On a practical level, the people who start
- 22 out as caseworker 1's, are being paid slightly less
- 23 than the caseworker 2's; is that right?
- 24 A Right.
- 25 Q And the caseworker 1's would typically be

- 1 to hire them, if possible, through appropriate civil
- 2 service means.
- 3 Q And when interns weren't paid, at the end
- 4 of the internship, if it was successful, back then,
- 5 did they become caseworker 2's?
- A At the time that I completed my internship,
- 7 there were different civil service classifications.
- Again, you would -- because there was no
- 9 intern program through civil service, whether you did
- 10 an internship or not, you had to take the civil
- 11 service test.
- I believe it was in 1988, that the Civil
- 13 Service Commission created the student intern
- 14 classification.
- 15 Q Do you know what caused the change at that
- 16 point in 1988, in the development of the paid program?
- 17 A The -- again, I can give you my opinion.
- I don't know factual.
- 19 I mean --
- 20 Q What's your opinion, as to why that
- 21 happened?
- 22 A My opinion is, and again, as -- I have
- 23 worked through the system, child welfare has a high
- 24 turnover rate, often times it is difficult to get
- 25 qualified people who want to work in the field, and so

- 1 it was an attempt on the part of civil service to
- 2 assist county agencies in recruitment, and retention,
- 3 and I do believe their bulletin speaks to that piece
- 4 of it.
- 5 And, that it sometimes, what would
- 6 happen -- well, what would happen prior to the civil
- 7 service classification, if an individual completed an
- 8 internship, they would have to do a -- they would have
- 9 to take the civil service test.
- 10 And, there, I believe, that there could
- 11 have been times when they, the agencies -- and I am
- 12 not -- I am talking generally, in Pennsylvania -- had
- 13 interns that they wanted to hire, and because of
- 14 numbers of people on the list, et cetera, and numbers
- 15 of vacancies, they may not have been able to hire
- 16 those people.
- 17 Q So if I understand correctly, it is your
- 18 belief that approximately prior to 1988, you are not
- 19 guaranteeing that date, that there was some time where
- 20 students would complete an internship, but then have
- 21 to take a competitive merit style civil service
- 22 test --
- 23 A Correct.
- 24 Q -- and actually sit for an exam, just like
- 25 everybody else, and fill it out?

- 1 A We choose to pay our student interns.
- 2 It is not a requirement of civil service,
- 3 it's highly recommended.
- 4 Q And to my understanding, that OCY does not
- 5 pay these student interns, the CWEB student interns;
- 6 is that correct?
- 7 A That's correct.
- 8 Q But you do pay the other interns, that you
- 9 receive from other institutions?
- 10 A Yes.
- 11 O And that's at the rate of \$9 an hour?
- 12 A I believe it's \$9 an hour.
- 13 Q And does that money -- if you know, does
- 14 that funding or money come out of the OCY budget, or
- 15 costs?
- 16 A I believe so. If it's reimbursed for
- 17 all -- as we are reimbursed for all salaries.
- 18 O Okay.
- 19 So for example, Mercyhurst does not pay the
- 20 \$9 an hour?
- 21 A Correct.
- 22 Q Are the student interns, that you hire, or
- 23 have worked for you, are they here over and above your
- 24 normal complement of caseworker positions?
- 25 A Yes.

- 1 Q So, hypothetically, if you have
- 2 20 caseworker positions, those are filled by, I am
- 3 going to say, employees of OCY, and then the student
- 4 interns are over and above those 20?
- 5 A Correct.
- 6 Q However many positions you would have?
- 7 A Correct.
- 8 Q So student interns are not hired in place
- 9 of caseworker 1's, 2's, 3's?
- 10 A Correct.
- 11 Q If a student intern, during the course of
- 12 an internship, is not performing satisfactorily, can
- 13 you terminate that internship?
- 14 A Absolutely.
- 15 O And have you done that?
- 16 A Absolutely.
- 17 Q Now, we talked about the student intern
- 18 list, and just to make the record clear, the student
- 19 intern list, from the civil service --
- 20 A Uh-huh.
- 21 Q -- that list is to fill, or hire student
- 22 interns who are still in college, to come into your
- 23 program?
- 24 A Correct.
- 25 Q Okay. That student intern list is not used

- 1 to hire caseworker 1's, 2's, et cetera?
- 2 A Right.
- 3 O You have been asked questions about a
- 4 series of individuals, and I am going to go back and
- 5 fill in a little bit of information, if you have it.
- 6 A Okay.
- 7 O Nicole Johnson?
- 8 A Yes.
- 9 Q Is she still employed?
- 10 A Yes, she is.
- 11 Q Christy Holden, you said she was a training
- 12 supervisor?
- 13 A Yes.
- 14 O Had she been a student intern, to your
- 15 recollection?
- 16 A She was a student intern.
- MS. LLOYD: I think that's all of the
- 18 guestions I have. Thank you.
- 19 EXAMINATION
- 20 BY MR. TAGGERT:
- 21 Q Follow up to that.
- 22 For the sake of this question, I'm assuming
- 23 that interns, because of their lack of experience,
- 24 just aren't as efficient as more experienced people.
- 25 Is that a fair assumption?

Case 1:04-cv-00341-SJM Document 23-3 Filed 04/03/2006 Page 15 of 19 SCSC-91 PA STATE CIVIL SERVICE COMMISSION CERTIFICATION OF ELIGIBLE 09/24/2003 REQUISITION NO. 0321 REQUESTED 09/24/03 09:54:20 CERTIFICATION NO. 12563 AGENCY 034 CLASS L0623 COUNTY CASEWORKER 1 (LOCAL GOVERNMENT) CODE 11 - EMPLOYMENT CERTIFICATION PART TIME LIST COUNTY 25 NO. OF POSITIONS 2 LOCATION 25 ERIE BUREAU Y725 SHIFT 1 USER: WELF0178 PART TIME POSITION SENIORITY UNIT LOWER CLASS ERIE CO CHD WEL SER (PATRICE) 154 W NINTH ST ERIE PA 16501 SENIORITY NAME / ADDRESS SSN TELEPHONE VET DATE FER AGENCY ACTION 92.00 WJT REXFORD JE 90.00 NR BONCZAR 88.00 APT 11/10/03 K L C M 86.00 WTP

DABROWSKI REYNOLDS С 85.00 PAV PASQUARETTE 84.00 APT 12/24/03 WARCHOL Κ LARSON E D 83.00 NCL 82.00 WJT RACE M D R D 82.00 NR GALLENSTEIN ZAJKOWSKI 82.00 AV L M С 79.00 WFD 05/01/04 BARNES Α CD79.00 NR NOVAK



	Case 1:04-	-cv-00341-SJM	1 Document	23-3	Filed 04/	/03/2006	Page 16 of 19)
NAME / ADD KIETA-BURL		SSN	ELEPHUNE	VE!	DAIL	PEK AGEN 90.00 NC	NUT AUTION	FMUL UZ
WESTFALL	T L			-		90.00 NC		
CAMMARATA	CL					89.00 NC		
JAMIESON	КМ			•		87.00 NC		
MCCLOSKEY	ΤJ			•		86.00 NC		
SMITH	KL					86.00 NC		
LANSINGER	E F			1		86.00 NC		
FRANK	R A			•		82.00 NC		

**** THIS CERTIFICATION EXPIRES ON 12/24/2003 ****

NAME:

TELEPHONE:

DATE SUBMITTED:

THIS IS NOT AN OFFICIAL COPY OF THE CERTIFICATION

RIQUISITION	NO. 032 CLASS LO MPLOYMEN ERIE	VIL SERVICE 25 REQUES 1624 COUNTY IT CERTIFICA	STED 10/28/03 0 CASEWORKER 2 TION	RITTICATION O 8:03:58 CERT (LOCAL GOVERN COUNTY 25 NO	F ELIGIBLE 10/20/2003 IFICATION NO. 14204	PAGE U1
	CO CHD W NINTH S		PA 16:	501	(BC/BC)	
NAME / ADDR	ESS D	SSN	TELEPHONE	SENIORIT VET DATE V	TY FER AGENCY ACTION 101.00 NC	
TROHOSKE	ΤM				92.00 NC	
PAGE	A L			•	90.00 NC	
CARIDEO	C M			-	90.00 NC	
HIGHFIELD	C L .			•	88.00 NC	
DABROWSKI KRAUSE	K A				88.00 NC 81.00 NC	
FISCHER	A L			b	69.00 NC	
CATALANO	R A			▶ V	103.00 NC	
DAVIS	PD				89.00 NC	
KURCSICS	RE			ı	86.00 NC	
GRAYSON	S D				86.00 NC	



	Case 1:04-	cv-00341-SJN	/I Documen	t 23-3	Filed 04	4/03/2006	Page 18 of	19
NAME / ADDI ALLEMANG	RESS M T	SSN	TELEPHONE	VET	DATE	FER AGENO 85.00 NC	CY ACTION	PAGE 02
FISHER	T L 2			B		84.00 NC		
VARNDELL	D O			•		84.00 NC		
BEMIS	D			•		83.00 NC		
CARPENTER	FT			•		B3.00 NC		
WEBER	ML			•		81.00 NC		
PHILLIPS	JM			•		68.00 NC		

**** THIS CERTIFICATION EXPIRES ON 01/27/2004 ****

NAME:

TELEPHONE: DATE SUBMITTED:

THIS IS NOT AN OFFICIAL COPY OF THE CERTIFICATION

Case 1:04-cv-00341-SJM Document 23-3 Filed 04/03/2006 Page 19 of 19

SCSC-91 PA STATE CIVIL SERVICE COMMISSION CERTIFICATION OF ELIGIBLE 10/29/2003 PAGE 01 REQUISITION NO. 0327 REQUESTED 10/29/03 09:49:09 CERTIFICATION NO. 14313 AGENCY 034 CLASS L0624 COUNTY CASEWORKER 2 (LOCAL GOVERNMENT)

CODE 11 - EMPLOYMENT CERTIFICATION PART TIME LIST LOCATION 25 ERIE COUNTY 25 NO. OF POSITIONS 1

BUREAU Y725 SHIFT 1
USER: BCHEDDAR SUBSTITUTE POSITION SENIORITY UNIT LOWER CLASS

ERIE CO CHD WEL SER (BC/BC)

154 W NINTH ST

ERIE PA 16501

SENIORITY

NAME / ADDRESS SSN TELEPHONE VET DATE FER AGENCY ACTION TROHOSKE T M 92.00 APT 11/12/03

DABROWSKI K L 88.00 NR

GRAYSON S D 86.00 NCL

CARPENTER F T 83.00 NR

PHILLIPS J 68.00 NR

**** THIS CERTIFICATION EXPIRES ON 01/28/2004 ****

NAME: TELEPHONE: DATE SUBMITTED:

THIS IS NOT AN OFFICIAL COPY OF THE CERTIFICATION

EXHIBIT